

1 Dennis F. Dunne (admitted *pro hac vice*)
2 Samuel A. Khalil (admitted *pro hac vice*)
3 MILBANK LLP
4 55 Hudson Yards
5 New York, New York 10001-2163
6 Telephone: (212) 530-5000
7 Facsimile: (212) 530-5219

8
9 *and*

10 Gregory A. Bray (SBN 115367)
11 Thomas R. Kreller (SBN 161922)
12 MILBANK LLP
13 2029 Century Park East, 33rd Floor
14 Los Angeles, CA 90067
15 Telephone: (424) 386-4000
16 Facsimile: (213) 629-5063

17 *Counsel for the Official Committee
18 of Unsecured Creditors*

19
20
21
22
23
24
25
26
27
28
**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

19 **In re:**

20 **PG&E CORPORATION**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC
23 COMPANY,**

24 **Debtors.**

25 Case No. 19-30088 (DM)

26 Chapter 11

27 (Lead Case)

28 (Jointly Administered)

19
20
21
22
23
24
25
26
27
28
**STATEMENT OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS IN RESPONSE TO THE
COURT'S INQUIRY REGARDING
POSSIBLE CONSENT TO THE
ESTIMATION PROCEEDINGS**

- 19 Affects PG&E Corporation
20 Affects Pacific Gas and Electric
21 Company
22 Affects both Debtors

23 * *All papers shall be filed in the Lead Case,
24 No. 19-30088 (DM).*

25 Re: Docket No. 3091

1 The Official Committee of Unsecured Creditors (the “Official Committee”) respectfully
2 submits this statement in response to the Court’s comments at the August 14, 2019 hearing (the
3 “Hearing”) with respect to of the Debtors’ *Motion Pursuant to 11 U.S.C §§ 105(a) and 502(c) for*
4 *the Establishment of Wildfire Claims Estimation Procedures* (the “Estimation Motion”) [Docket
5 No. 3091].¹

6 At the Hearing, the Court requested that the Official Committee poll the Debtors, the Ad
7 Hoc Group of Subrogation Claim Holders and the Official Committee of Tort Claimants to
8 determine whether those parties would agree to have all issues in dispute in the anticipated claims
9 estimation process heard and decided by the Bankruptcy Court. The Official Committee has
10 received responses from the parties and reports that there is not unanimous consent to the Court’s
11 inquiry.

12
13 Dated: August 19, 2019

14
15 **MILBANK LLP**

16
17 /s/Gregory A. Bray
18 DENNIS F. DUNNE
19 SAMUEL A. KHALIL
20 GREGORY A. BRAY
21 THOMAS R. KRELLER

22
23 *Counsel for the Official Committee of*
24 *Unsecured Creditors*

25
26
27
28 ¹ Capitalized terms not defined herein have the meaning ascribed to them in the Wildfire Fund Motion.